# UNITED STATES DISTRICT COURT

for the

Southern Distr	ict of New York
Civil	Division
Beverley Griffith-Fenton	Case No. 18 CV 11031
Plaintiff(s) (Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiff's cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)  -V-	Jury Trial: (check one) Yes No
Defendant(s)  (Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page	) ) ) ) )
with the full list of names.)	J

## COMPLAINT FOR A CIVIL CASE ALLEGING BREACH OF CONTRACT (28 U.S.C. § 1332; Diversity of Citizenship)

#### I. The Parties to This Complaint

#### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Beverley Griffith-Fenton	
Street Address	17 Prospect AVE	_
City and County	Middletown, Orange County	_
State and Zip Code	N.Y.10940	_
Telephone Number	845-381-1668(H);845-341-8827(C)	_
E-mail Address	bevfenton@gmail.com	_

#### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1	
Name	JP Morgan Chase N.A. c/o Fein Such Christopher Pavlik,Esq
Job or Title (if known)	Attorney for the Defendants
Street Address	1400 Old Country Road
City and County	Westbury,NY
State and Zip Code	N.Y.11590
Telephone Number	516394-6921
E-mail Address (if known)	CPAVLIK@FEINSUCH.COM
Defendant No. 2	
Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	
Defendant No. 3	
Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	
Defendant No. 4	
Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

	1.	If the plaintiff is an in	dividual	
		The plaintiff, (name)	Beverley Griffith-Fenton	, is a citizen of the
		State of (name) New	York .	
	2.	If the plaintiff is a cor	poration	
	The plaintiff, (name)		, is incorporated	
		under the laws of the	State of (name)	<u> </u>
		and has its principal p	lace of business in the State of (name)	
			·	
	(If me same	ore than one plaintiff is n information for each add	amed in the complaint, attach an addition litional plaintiff.)	nal page providing the
•	same	ore than one plaintiff is n information for each add Defendant(s)	amed in the complaint, attach an addition ditional plaintiff.)	nal page providing the
•	same	information for each add	litional plaintiff.)	nal page providing the
•	The 1	Information for each add  Defendant(s)  If the defendant is an i	litional plaintiff.)	
•	The 1	Defendant(s)  If the defendant is an i The defendant, (name)	individual  JP Morgan Chase N.A	, is a citizen of
•	The 1	Information for each add  Defendant(s)  If the defendant is an i  The defendant, (name)	individual  JP Morgan Chase N.A	
•	The 1	Information for each add  Defendant(s)  If the defendant is an i  The defendant, (name) the State of (name)	individual  JP Morgan Chase N.A  lew York	, is a citizen of
	The I	Information for each add  Defendant(s)  If the defendant is an i  The defendant, (name)  the State of (name) N  (foreign nation)	individual  JP Morgan Chase N.A  lew York  orporation	, is a citizen of Or is a citizen of
•	The I	Information for each add  Defendant(s)  If the defendant is an i  The defendant, (name) the State of (name)  (foreign nation)  If the defendant is a co	individual  JP Morgan Chase N.A  lew York  orporation	, is a citizen of  Or is a citizen of  , is incorporated under
	The I	Information for each add  Defendant(s)  If the defendant is an interpretation of the State of (name) of the State of (name) of the defendant is a continuous of the defendant, (name) of the laws of the State of the	individual  JP Morgan Chase N.A  lew York  proporation  f (name)  ness in the State of (name)	, is a citizen of  Or is a citizen of  , is incorporated under , and has its
	The I	Information for each add  Defendant(s)  If the defendant is an interpretation of the State of (name) of the State of (name) of the defendant is a contract of the defendant, (name) of the laws of the State of principal place of busing	individual  JP Morgan Chase N.A  lew York  proporation  f (name)  mess in the State of (name)  er the laws of (foreign nation)	, is a citizen of  Or is a citizen of  , is incorporated under

## C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

	Case 1:18-cv-11031-UA Document 1 Filed 11/27/2	18 Page 4 of 5
Pro Se	4 (Rev. 12/16) Complaint for a Civil Case Alleging Breach of Contract	
5	False foreclosure October 15,2010 Real Forever years later with Intention to steal property	5,000.00 ;Grand Total=\$300,000.00 reclosure July 25,20
m.	Statement of Claim	
	Write a short and plain statement of the claim. Do not make legal argument facts showing that each plaintiff is entitled to the damages or other relief so involved and what each defendant did that caused the plaintiff harm or viole the dates and places of that involvement or conduct. If more than one claim write a short and plain statement of each claim in a separate paragraph. Att	ught. State how each defendant was ated the plaintiff's rights, including a is asserted, number each claim and
	The plaintiff, (name) Beverley Griffith-Fenton	, and the defendant,
	(name) Chase Home Finance/JP Morgang Chase NA	, made an agreement or contract on
	(date) 11/01/2007 . The agreement or contract was (oral or written)	. Under that
	The Mortgage Promissory Note and Security Instrument requires payment be a late fee was charged. Plaintiff was compliant until Defendant foreclosed the was made unable to pay mortgage despite pointing out the many errors to Barred in July 2017. The Note and Security Instrument requires that Interest payments yet in instances Defendant move large cash to Principal depleting	e mortgage October 15,2010 and Defendant.This process now Time he paid first from all mortgage
	The defendant failed to comply because (specify what the defendant did or failed to agreement or contract required)  JP Morgan Chase NA.Servicing Process failed to comply because when the mortgage October 15,2010, having no Contract with me directly, that was illeplace large sum under Principal without paying Interest First. They were Negligible un-nessary Forced-Placed Insurance and junk fees. Reference Number: Foreclosure Review/Federal Government declare that this was deficient more	y Refused payments and Foredosed gal.They failed to comply when they lient when they failed to remove all 1608331800 of the Independent
	The plaintiff has complied with the plaintiff's obligations under the contract.	
IV.	Relief	
	State briefly and precisely what damages or other relief the plaintiff asks the arguments. Include any basis for claiming that the wrongs alleged are conting the amounts of any actual damages claimed for the acts alleged and the basis punitive or exemplary damages claimed, the amounts, and the reasons you continue money damages.  Generally to return my Home to me with no strings attached.	nuing at the present time. Include
	<ol> <li>For Compensatory Damages in an amount to be determined by proof at trial.</li> <li>For Special Damages in an amount to be determined by proof at trial.</li> <li>For general Damages in an amount to be determined by proof at trial.</li> <li>For Punitive damages as allowed by law</li> <li>For Restitution as allowed by law</li> </ol>	ial.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:	11/23/2018
Signature of Plaintiff Printed Name of Plaintiff	Beverley Griffith-Fention  Beverley Griffith-Fention
For Attorneys	
Date of signing:	
Signature of Attorney	
Printed Name of Attorney	
Bar Number	
Name of Law Firm	
Street Address	
State and Zip Code	
Telephone Number	
E-mail Address	
	Signature of Plaintiff Printed Name of Plaintiff For Attorneys  Date of signing:  Signature of Attorney Printed Name of Attorney Bar Number Name of Law Firm Street Address State and Zip Code Telephone Number